

UNITED STATES DISTRICT COURT

for the
SOUTHERN DISTRICT OF TEXASUnited States Courts Southern
District of Texas

FILED

United States of America
v.

Case No. 7:21-MJ-2540

December 7, 2021

Nathan Ochsner, Clerk of Court

Jessenia FLORES-Salinas(YOB:1995/MEX)
Julia Judith FLORES-Salinas(YOB:1999/MEX)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/22/21-12/2/21 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 1956(a)(2) and 18 U.S.C. 1956
(h)International Money Laundering and Money
Laundering Conspiracy

This criminal complaint is based on these facts:

(See Attachment I).

Sworn to and executed by reliable electronic means, sworn to and attested to telephonically per FED.R.CR.4.1 and
probable cause found on:☒ Continued on the attached sheet.

Reviewed by AUSA Patricia Profit

/s/ Danielle Martin

Complainant's signature

Danielle Martin, DEA Special Agent

Printed name and title

Date: 12/7/2021 at 5:30 p.m.City and state: McAllen, Texas

Judge's signature

J. Scott Hacker, US Magistrate Judge

Printed name and title

Attachment A**INTERNATIONAL MONEY LAUNDERING**

On or about the date set forth below, in the Southern District of Texas, the defendants, Jessenia Flores-Salinas and Julia Judith Flores-Salinas, transported, transmitted, or transferred, or attempted to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States---

Knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer is designed in whole or in part.

To conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

COUNT	DEFENDANT	DATE	FUNDS
1	Jessenia Flores-Salinas/Julia Judith Flores-Salinas	October 22, 2021	\$9,230.00
2	Jessenia Flores-Salinas/Julia Judith Flores-Salinas	December 2, 2021	\$809,980.00

In violation of Title 18, United States Code, Section 1956(a)(2)(B)(i)

This criminal complaint is based on the following facts:

On October 22, 2021, Alyssa Vera attempted to smuggle \$9,230.00 in US currency into the United States from Mexico at the Roma Port of Entry. The funds Alyssa Vera attempted to smuggle were destined for a residence located at 879 Austin Street, Roma, Texas. The residence is owned and occupied by Jessenia Flores-Salinas.

On December 2, 2021, United States Border Patrol (USBP) Agents assisted by Starr County Sheriff's Office (SCSO) deputies established surveillance at 879 Austin Street, Roma, Texas. Agents observed a female, who they believed to be Jessenia Flores-Salinas, and a juvenile arrive in a white Kia SUV with Mexican license plates and greet a male at the residence. Agents observed that the male individual appeared to resemble Hugo Armando Cortinas-Salinas, who has been identified as a plaza boss for the Gulf Cartel in Miguel Aleman, Tamaulipas, Mexico. Shortly after, agents observed the white Kia SUV depart the residence with the male individual in the passenger side. A Starr County Sheriff's Office deputy conducted a probable cause traffic stop on the white Kia SUV and identified the driver as Jessenia Flores-Salinas. Agents learned that three (3) individuals in the Kia SUV were in the United States illegally and deputies subsequently contacted

USBP. After the traffic stop, USBP and SCSO believing there may be additional illegal aliens or bulk currency present at 879 Austin Street, Roma, Texas approached the residence and obtained consent to search it from Julia Flores-Salinas (Jessenia Flores Salinas's sister). While conducting the search, agents found bulk US currency concealed in shoe boxes and backpacks in the master bathroom and closet of the residence. Agents also located additional bulk currency in concealed compartments of an entertainment center in the living room. The U.S. currency found in the residence totaled \$809,980.00.

Transports, transmits, or transfers, or attempt to transport, transmit, or transfer:

The following evidence will show Alyssa Vera transported and attempted to transport funds into the United States from Mexico through the Roma Port of Entry for Jessenia Flores-Salinas.

- On October 22, 2021, Alyssa Vera was discovered to be smuggling \$9,230.00 in US currency from Mexico to the United States through the Roma, TX Port of Entry. During an interview, Alyssa Vera stated she was transporting the funds to Jessenia Flores-Salinas at 879 Austin Street, Roma, Texas. Alyssa Vera stated she had smuggled approximately \$50,000.00 in US currency from Mexico into the United States to 879 Austin Street, Roma, Texas in the past. Alyssa Vera further stated that the bulk currency she smuggled into the United States from Mexico was proceeds from alien smuggling activity.
- On December 2, 2021, USBP agents conducted a consent search at 879 Austin Street, Roma, Texas where they found \$809,980.00 concealed inside shoe boxes, backpacks, and two (2) concealed compartments in an entertainment center. Julia Flores-Salinas (Jessenia Flores-Salinas's sister) told agents the money belonged to Jessenia Flores-Salinas. She also told the agents that Jessenia Flores-Salinas was married to Hugo Armando Cortinas-Salinas, a narcotics smuggler from Miguel Aleman, Tamaulipas, Mexico and that the bulk currency was drug proceeds.

Funds or monetary instruments into or out of the United States:

The following evidence will show Alyssa Vera transported and attempted to transport funds into the United States from Mexico to Jessenia Flores-Salinas.

- On October 22, 2021, Alyssa Vera was discovered to be smuggling \$9,230.00 in US currency from Mexico to the United States through the Roma, TX Port of Entry. During an interview, Alyssa Vera stated she was transporting the funds to 879 Austin Street, Roma, Texas to Jessenia Flores-Salinas. Alyssa Vera stated she had smuggled approximately \$50,000 in US currency from Mexico into the United States to 879 Austin Street, Roma, Texas in the past.
- On December 2, 2021, USBP agents conducted a consent search at 879 Austin Street, Roma, Texas where they found \$809,980.00 concealed inside shoe boxes and backpacks in the master bathroom/closet and two (2) concealed compartments

in an entertainment center. Julia Flores-Salinas (Jessenia Flores-Salinas's sister) told agents the money belonged to Jessenia Flores-Salinas. She also told the agents that Jessenia Flores-Salinas was married to Hugo Armando Cortinas-Salinas, a narcotics smuggler from Miguel Aleman, Tamaulipas, Mexico and that the bulk currency was drug proceeds.

Knowledge that the monetary instrument or funds involved represent the proceeds of some form of unlawful activity:

The following evidence will show Jessenia Flores-Salinas and Julia Judith Flores-Salinas were aware the funds involved were proceeds from Hugo Armando Cortinas-Salinas' drug trafficking and alien smuggling activity.

- On October 22, 2021, Alyssa Vera was discovered to be smuggling \$9,230.00 in US currency from Mexico to the United States through the Roma, TX Port of Entry. During an interview, Alyssa Vera stated she was transporting the funds to 879 Austin Street, Roma, Texas to Jessenia Flores-Salinas. Alyssa Vera stated she had smuggled approximately \$50,000.00 in US currency from Mexico into the United States to 879 Austin Street, Roma, Texas in the past and that the bulk currency was from alien smuggling activity.
- On December 2, 2021, USBP agents conducted a consent search at 879 Austin Street, Roma, Texas where they found \$809,980.00 concealed inside shoe boxes, backpacks, and two (2) concealed compartments in an entertainment center. Julia Flores-Salinas (Jessenia Flores-Salinas's sister) told the agents the money belonged to Jessenia Flores-Salinas. She also told the agents Jessenia Flores-Salinas was married to Hugo Armando Cortinas-Salinas, a narcotics smuggler from Miguel Aleman, Tamaulipas, Mexico and that the bulk currency was drug proceeds. Julia Flores-Salinas stated that she (Julia Flores-Salinas) would count the funds for Jessenia Flores-Salinas at the residence to confirm the amount.
- Subsequent to her arrest, Julia Flores-Salinas provided agents consent to search her cellphone. A review of the cellphone revealed videos of Julia Flores-Salinas counting large stacks of US currency. Agents also observed photographs of CBP documents of the \$9,230.00 seizure from Alyssa Vera saved in the cellphone.

Knowledge that such transportation, transmission, or transfer is designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity:

The following evidence will show Jessenia Flores-Salinas and Julia Judith Flores-Salinas were aware the transportation and attempted transportation of the funds was designed to conceal the nature, location, source, ownership, or control of the proceeds from drug trafficking activity

- On October 22, 2021, Alyssa Vera was discovered to be smuggling \$9,230.00 from Mexico into the United States at the Roma, Texas port of entry. The funds were in an envelope in the vehicle. Alyssa Vera attempted to cross the funds without declaring them to Customs and Border Protection (CBP) personnel.
- On December 2, 2021, USBP agents discovered \$809,980.00 in U.S. currency at 879 Austin Street, Roma, Texas. The funds were concealed inside shoe boxes, backpacks, and two (2) concealed compartments in an entertainment center.
- Subsequent to her arrest, Julia Flores-Salinas provided agents consent to search her cellphone. A review of the cellphone revealed videos of Julia Flores-Salinas counting large stacks of US currency. Agents also observed photographs of CBP documents of the \$9,230.00 seizure from Alyssa Vera saved in the cellphone.

MONEY LAUNDERING CONSPIRACY

On or about the date set forth below, in the Southern District of Texas, and elsewhere, the defendants, Jessenia Flores-Salinas and Julia Judith Flores-Salinas, did knowingly conspire with others known and unknown to commit international money laundering in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

COUNT	DEFENDANTS	DATE	FUNDS
1	Jessenia Flores-Salinas/Julia Judith Flores-Salinas	October 22, 2021 to December 2, 2021	\$9,230.00
2	Jessenia Flores-Salinas/Julia Judith Flores-Salinas	From or about October 22, 2021 to December 2, 2021	\$809,980.00

In violation of Title 18, United States Code, Section 1956(h)

This criminal complaint is based on the following facts:

On October 22, 2021, Alyssa Vera attempted to transport \$9,230.00 U.S. currency, proceeds from drug trafficking and or alien smuggling activity from Mexico, through the Roma Port of Entry, into the United States. The funds were destined for 879 Austin Street, Roma, Texas, a residence owned by Jessenia Flores-Salinas.

On December 2, 2021, a consent search was conducted at 879 Austin Street, Roma, Texas, where \$809,980.00 in U.S. currency, proceeds from drug trafficking were uncovered hidden inside shoe boxes and backpacks in the master bathroom and closet

and two (2) concealed compartments in an entertainment center. The funds were secured with rubber bands and envelopes.

Agreement by two or more parties to commit an offense under 18 USC 1956 or 1957:

The following evidence will show Jessenia Flores-Salinas and Julia Judith Flores-Salinas agreed with other known and unknown persons to transport drug trafficking and alien smuggling proceeds from Mexico into the United States to be received at 879 Austin Street, Roma, Texas.

- During an interview, Alyssa Vera stated she was smuggling the funds for Jessenia Flores-Salinas. She stated the funds were proceeds of alien smuggling activity.
- Part of the funds found at 879 Austin Street, Roma, Texas were located inside hidden compartments in an entertainment center.
- Julia Flores-Salinas stated during a post-arrest interview that Jessenia Flores-Salinas was the owner of the funds and was married to drug trafficker, Hugo Armando Cortinas-Salinas. Julia Flores-Salinas stated that the funds were drug proceeds and that she (Julia Flores-Salinas) would count the funds for Jessenia Flores-Salinas at the residence to confirm the amount.
- Subsequent to her arrest, Julia Flores-Salinas provided agents consent to search her cellphone. A review of the cellphone revealed videos of Julia Flores-Salinas counting large stacks of US currency. Agents also observed photographs of CBP documents of the \$9,230.00 seizure from Alyssa Vera saved in the cellphone.

Subject joins the agreement knowing its purpose:

The following evidence will show Jessenia Flores-Salinas and Julia Flores-Salinas were aware the purpose of transporting the funds from Mexico into the United States was designed to conceal the nature, location, source, ownership, or control of the drug trafficking and alien smuggling proceeds.

- During the interview of Alyssa Vera, she stated she was smuggling the funds for Jessenia Flores-Salinas. She stated the funds were proceeds of alien smuggling activity.
- Part of the funds found at 879 Austin Street, Roma, Texas were located inside hidden compartments in an entertainment center.
- Julia Flores-Salinas stated during a post-arrest interview that Jessenia Flores-Salinas was the owner of the funds and was married to drug trafficker, Hugo Armando Cortinas-Salinas. Julia Flores-Salinas stated that the funds were drug

proceeds and that she (Julia Flores-Salinas) would count the funds for Jessenia Flores-Salinas at the residence to confirm the amount.

- Subsequent to her arrest, Julia Flores-Salinas provided agents consent to search her cellphone. A review of the cellphone revealed videos of Julia Flores-Salinas counting large stacks of US currency. Agents also observed photographs of CBP documents of the \$9,230.00 seizure from Alyssa Vera saved in the cellphone.

Intent to further the illegal purpose:

The following evidence will show the purpose of the conspiracy was to transport the funds from Mexico into the United States in a way that would conceal the nature, location, source, ownership, or control of the drug trafficking and alien smuggling proceeds.

- Alyssa Vera's attempt to smuggle the funds on October 22, 2021 without declaring them to CBP personnel and the storage of the funds found on December 2, 2021 in hidden compartments of an entertainment center show the intent of the conspiracy was to conceal the nature, location, source, ownership or control of the drug trafficking and alien smuggling proceeds.